

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CARE INVESTMENT TRUST, INC.,

Plaintiff,

v.

JEAN-CLAUDE SAADA; CAMBRIDGE ONALP, INC.; CAMBRIDGE NASSAU BAY GP LLC; 6000 GREENVILLE, INC.; ALLEN MOB, INC.; 5280 MEDICAL DRIVE, INC.; CAMBRIDGE GORBUTT MOB, INC.; CAMBRIDGE TARRANT, INC.; CHMP MANAGER, LLC; CAMBRIDGE B/R, INC.; CAMBRIDGE-GREENVILLE DALLAS, LLC; PMC CAMBRIDGE OF PLANO, LTD; CAMBRIDGE-CROWN ATRIUM LLC; and CAMBRIDGE NORTH TEXAS HOLDINGS, LLC,

Defendants.

No. 3:09-cv-02256-K

JEAN-CLAUDE SAADA; CAMBRIDGE ONALP, INC.; CAMBRIDGE NASSAU BAY GP LLC; 6000 GREENVILLE, INC.; ALLEN MOB, INC.; 5280 MEDICAL DRIVE, INC.; CAMBRIDGE GORBUTT MOB, INC.; CAMBRIDGE TARRANT, INC.; CHMP MANAGER, LLC; CAMBRIDGE B/R, INC.; CAMBRIDGE-GREENVILLE DALLAS, LLC; PMC CAMBRIDGE OF PLANO, LTD; CAMBRIDGE-CROWN ATRIUM LLC; and CAMBRIDGE NORTH TEXAS HOLDINGS, LLC,

Counterclaim Plaintiffs,

v.

CARE INVESTMENT TRUST, INC.; CIT HEALTHCARE, LLC; FLINT D. BESECKER; and ERC SUB, LP,

Counterclaim and Third Party
Defendants.

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING REPLY IN
SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

Defendants and Counterclaim Plaintiffs Jean-Claude Saada, Cambridge Onalp, Inc., Cambridge Nassau Bay GP LLC, 6000 Greenville, Inc., Allen MOB, Inc., 5280 Medical Drive, Inc., Cambridge Gorbett MOB, Inc., Cambridge Tarrant, Inc., CHMP Manager, LLC, Cambridge B/R, Inc., Cambridge-Greenville Dallas, LLC, PMC Cambridge of Plano, Ltd., Cambridge-Crown Atrium LLC, and Cambridge North Texas Holdings, LLC (collectively, "Defendants" or "Cambridge") file this Motion to Extend the Deadline for Filing a Reply in Support of Defendants' Motion to Dismiss as follows:

1. Plaintiff Care Investment Trust, Inc. ("Plaintiff" or "Care") filed its Complaint in this lawsuit on November 25, 2009. On January 27, 2010, Defendants filed an Answer, Counterclaim, and Third Party Complaint, as well as a Motion to Dismiss Plaintiff's Fourth and Fifth Causes of Action. (*See* Docket Nos. 24 & 39). On March 5, 2010, Plaintiff filed its Response to Defendants' Motion to Dismiss. (*See* Docket Nos. 47 & 48). Accordingly, pursuant to the Local Rules, Defendants' Reply in support of their Motion to Dismiss is currently due on or before March 19, 2010.

2. In order to have adequate time to thoroughly address the issues raised in Plaintiff's Response to Defendants' Motion to Dismiss, Defendants' seek a one-week extension in which to file their Reply in support of their Motion to Dismiss. Accordingly, Defendants request that the deadline for filing their Reply in support of their Motion to Dismiss Plaintiff's Fourth and Fifth Causes of Action be extended by seven (7) days to March 26, 2010.

3. Counsel for Defendants has conferred with counsel for Plaintiff, and counsel for Plaintiff indicated that Plaintiff is not opposed to the relief requested herein.

4. The extension requested herein will not affect any other currently pending deadlines. The extension, moreover, is not sought or intended to delay this matter.

WHEREFORE, Defendants request that the Court grant this Motion and extend the deadline for filing a Reply in support of Defendants' Motion to Dismiss Plaintiff's Fourth and Fifth Causes of Action up to, and including, March 26, 2010.

JACKSON WALKER L.L.P.

By: /s/ Robert M. Cohan

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Medical Drive Inc., Cambridge Gorbett
MOB Inc., Cambridge Tarrant Inc.,
CHMP Manager LLC, Cambridge B/R
Inc., Cambridge-Greenville Dallas LLC,
PMC Cambridge of Plano Ltd.,
Cambridge Crown Atrium LLC and
Cambridge North Texas Holdings LLC*

Certificate of Conference

This is to certify that on March 18, 2010, counsel for Defendants conferred with counsel for Plaintiff regarding the merits of the foregoing motion, and counsel for Plaintiff stated that Plaintiff is not opposed to the relief requested.

/s/ Robert M. Cohan

Robert M. Cohan

Certificate of Service

This is to certify that on this 18th day of March, 2010, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served all counsel of record electronically as authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Robert M. Cohan

Robert M. Cohan

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